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7 Attorneys for Debtors and Debtors in
8 Possession, SCOOBEZ, SCOOBEZ GLOBAL,
INC., and SCOOBUR, LLC

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES**

14 In re:

15 SCOOBEZ, et al.¹

16 Debtors and Debtors in Possession.

17 Affects:

- All Debtors
- Scoobeez, ONLY
- Scoobeez Global, Inc., ONLY
- Scoobur LLC, ONLY

Case No. 2:19-bk-14989-WB
Jointly Administered:
2:19-bk-14991-WB; 2:19-bk-14997-WB

Chapter 11

**STIPULATION EXTENDING TIME TO
REPLY TO OBJECTIONS TO
APPLICATIONS FOR COMPENSATION**

Hearing

Date: December 5, 2019
Time: 10:00 a.m.
Place: Courtroom 1375
U.S. Bankruptcy Court
255 East Temple Street
Los Angeles, CA 90012

28 ¹ The Debtors and the last four digits of their respective federal taxpayer identification numbers are as follows: Scoobeez (6339); Scoobeez Global, Inc. (9779); and Scoobur, LLC (0343). The Debtors' address is 3463 Foothill Boulevard, Glendale, California 91214.

INTRODUCTION

Scoobeez, Scoobeez Global, Inc., and Scoobur LLC, as debtors and debtors in possession (the “Debtors”), Hillair Capital Management LLC and its affiliates (“Hillair”), Shahan Ohanessian and Shoushana Ohanessian (together, the “Ohanessians”), and the Office of the United States Trustee (the “U.S. Trustee,” and together with the Debtors, Hillair, and the Ohanessians, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree as follows:

RECITALS

A. On October 15, 2019, Armory Securities, LLC filed its FIRST INTERIM FEE APPLICATION OF ARMORY SECURITIES, LLC FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JULY 1, 2019 THROUGH AUGUST 31, 2019 [Docket No. 371] (the “Armory Fee Application”).

B. On October 15, 2019, Conway MacKenzie, Inc. filed its FIRST INTERIM FEE APPLICATION OF CONWAY MACKENZIE, INC. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM MAY 10, 2019 THROUGH AUGUST 31, 2019 [Docket No. 372] (the “Conway Fee Application”).

C. On October 15, 2019, Foley & Lardner LLP filed its FIRST INTERIM FEE APPLICATION OF FOLEY & LARDNER LLP FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM APRIL 30, 2019 THROUGH AUGUST 31, 2019 [Docket No. 376] (the “Foley Fee Application”).

D. On October 16, 2019, Levene, Neale, Bender, Yoo & Brill L.L.P. filed its FIRST INTERIM APPLICATION OF LEVENE, NEALE, BENDER, YOO & BRILL L.L.P. FOR APPROVAL OF FEES AND REIMBURSEMENT OF EXPENSES INCURRED AS GENERAL BANKRUPTCY COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD OF MAY 22, 2019 TO AUGUST 31, 2019 [Docket No. 378] (the “LNYB Fee Application,” and, together with the Armory Fee Application, the Conway Fee Application, and the Foley Fee Application, the “Fee Applications”).

E. The Fee Applications were duly noticed for hearing on December 5, 2019 (the “Hearing”).

F. On November 20, 2019, the U.S. Trustee filed the following objections: (1) OBJECTION

1 TO FIRST INTERIM FEE APPLICATION OF ARMORY SECURITIES, LLC FOR ALLOWANCE OF COMPENSATION
2 AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JULY 1, 2019 THROUGH AUGUST 31, 2019
3 [Docket No. 446]; (2) OBJECTION TO FIRST INTERIM FEE APPLICATION OF CONWAY MACKENZIE, INC.
4 FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM MAY 10,
5 2019 THROUGH AUGUST 31, 2019 [Docket No. 447]; and (3) OBJECTION TO FIRST INTERIM FEE
6 APPLICATION OF FOLEY & LARDNER LLP FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
7 EXPENSES FOR THE PERIOD FROM APRIL 30, 2019 THROUGH AUGUST 31, 2019 [Docket No. 448]
8 (collectively, the “U.S. Trustee Objections”).

9 G. On November 21, 2019, the Ohanessians filed their OBJECTION TO FIRST INTERIM FEE
10 APPLICATION OF FOLEY & LARDNER LLP [Docket No. 449] (the “Ohanessians Objection”).

11 H. On November 21, 2019, Hillair filed its OMNIBUS OPPOSITION TO FIRST INTERIM FEE
12 APPLICATIONS OF (I) FOLEY & LARDNER LLP, (II) CONWAY MACKENZIE, INC., (III) ARMORY SECURITIES,
13 LLC, AND (IV) LEVENE, NEALE, BENDER, YOU, & BRILL L.L.P. (the “Hillair Objection,” and, together
14 with the U.S. Trustee Objections and the Ohanessians Objection, the “Objections”).

15 I. No other objections to the Fee Applications were filed.

16 J. The current deadline for filing replies to the Objections is Friday, November 29, 2019
17 (the “Reply Deadline”).

18 K. The Parties have conferred regarding the Reply Deadline, and agree to extend the Reply
19 Deadline as set forth herein.

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STIPULATION

1. The Parties agree to extend the Reply Deadline from November 29, 2019 to December 2, 2019.

2. The Parties therefore respectfully request entry of an order extending the Reply Deadline to December 2, 2019.

SO STIPULATED:

Dated: November 27, 2019

SCOOBEEZ
SCOOBEEZ GLOBAL, INC.
SCOOBUR LLC

By: /s/ Ashley M. McDowell
Ashley M. McDowell
FOLEY & LARDNER LLP
Counsel for Debtors

Dated: November 27, 2019

UNITED STATES TRUSTEE

By: Dare
Dare Law

Dated: November 27, 2019

SHAHAN OHANESSIAN AND SHOUSSHANA OHANESSIAN

By: _____
~~Jeffrey S. Shinbrot
THE SHINBROT FIRM
Counsel for Shahad Ohanessian and Shoushana Ohanessian~~

Dated: November 27, 2019

HILLAIR CAPITAL MANAGEMENT LLC and affiliates

By: _____
Adam H. Friedman
OLSHAN
Counsel for Hillair Capital Management LLC

STIPULATION

1. The Parties agree to extend the Reply Deadline from November 29, 2019 to December 2, 2019.

2. The Parties therefore respectfully request entry of an order extending the Reply Deadline to December 2, 2019.

SO STIPULATED:

Dated: November 27, 2019

SCOOBEEZ
SCOOBEEZ GLOBAL, INC.
SCOOBUR LLC

By: /s/ Ashley M. McDow
Ashley M. McDow
FOLEY & LARDNER LLP
Counsel for Debtors

Dated: November 27, 2019

OFFICE OF THE UNITED STATES TRUSTEE

By: _____
Dare Law

Dated: November 27, 2019

SHAHAN OHANESSIAN AND SHOUSHANA OHANESSIAN

By: _____
Jeffrey S. Shinbrot
THE SHINBROT FIRM
Counsel for Shahan Ohanessian and Shoushana Ohanessian

Dated: December 2, 2019

BUCHALTER, a Professional Corporation

By: Anthony J. Napolitano

Counsel for Hillair Capital Management LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Foley & Lardner LLP, 555 South Flower Street, Suite 3300, Los Angeles, CA 90072-2411

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION EXTENDING TIME TO REPLY TO OBJECTIONS TO APPLICATIONS FOR COMPENSATION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 12/02/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 12/02/2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Julia W. Brand United States Bankruptcy Court Central District of California Edward R. Roybal Federal Building and Courthouse 255 E. Temple Street, Suite 1382 Los Angeles, CA 90012	
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Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/02/2019

Ashley M. McDow

/s/ *Ashley M. McDow*

Date

Printed Name

Signature

PROOF OF SERVICE OF DOCUMENT CONT.

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- **John-Patrick M Fritz** jpf@lnbyb.com, JPF.LNBYB@ecf.inforuptcy.com
- **Riebert Sterling Henderson** shenderson@gibbsgiden.com
- **Vivian Ho** BKClaimConfirmation@ftb.ca.gov
- **Alvin Mar** alvin.mar@usdoj.gov
- **Ashley M McDow** amcdow@foley.com,
sgaeta@foley.com;mhebbeln@foley.com;swilson@foley.com;jsimon@foley.com
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- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Eric K Yaeckel** yaekel@sullivanlawgroupapc.com